

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION

JONATHAN MANGAN, individually,)
and on behalf of all other)
persons similarly situated,)

Plaintiff,)

v.)

CHRISTIAN COUNTY, MISSOURI,)
by and through its Board of)
County Commissioners, ROY)
MATTHEWS, TOM CHUDOMELKA, and)
BILL BARNETT, in their)
official capacities; and)
STEVE WHITNEY, Sheriff of)
Christian County, in his)
official capacity.)

Defendants.)

Case No. 99-3373-CV-C-RGC

MOTION FOR CLASS CERTIFICATION

COMES NOW the Plaintiff, Jonathan Mangan, by and through the undersigned counsel, and hereby moves this Honorable Court that the above captioned case be certified as a class action pursuant to Rule 23 of the Federal Rules of Civil Procedure.

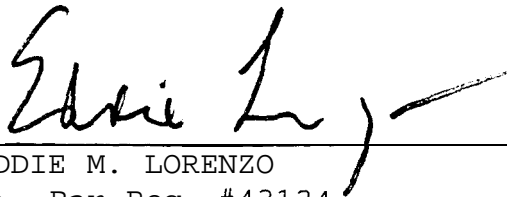
As stated more fully in the Plaintiff's brief attached hereto, the requirements of Rule 23(a) are met:

(1) the class is so numerous that joinder of all members is impractical, (2) there are questions of law or fact common to the class, (3) the claims or defenses of the

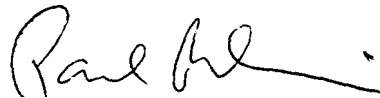
representative party are typical of the claims or defenses of the class, and (4) the representative party will fairly and adequately protect the interests of the class.

Moreover, this case is maintainable as a class action under Rule 23(b) Fed. R. Civ. P. because "the party opposing the class has acted or refused to act on grounds generally applicable to the class, thereby making appropriate final injunctive relief or corresponding declaratory relief with respect to the class as a whole."

Respectfully submitted,



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